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January 24, 2022

BY ECF & EMAIL

The Honorable Kimba M. Wood  
 United States District Court Judge  
 Southern District of New York  
 500 Pearl Street  
 New York, New York 10007

MEMO ENDORSED

**Re: United States v. James David Williams; 16 Cr. 436 (KMW)**

Dear Judge Wood:

As the Court is aware, I represent James David Williams in the above-referenced matter, pursuant to the provisions of the Criminal Justice Act (“CJA”), 18 U.S.C. § 3006A. On December 17, 2021, Mr. Williams was sentenced for his violations related to his supervision to 18 months’ incarceration, followed by 18 months’ supervised release. He is scheduled to surrender on January 31, 2022.

I write to respectfully request a modification of Mr. Williams’ bail conditions<sup>1</sup> to allow him to travel to the District of Arizona tomorrow, January 25, 2022, returning on January 26, 2022; and again on January 29, 2022 and then either return to California the next day to surrender at FCI Lompoc/USP Lompoc (camp), or remain in Arizona to surrender at FCI Tucson/USP Tucson (camp) or FCI Phoenix, on January 31, 2022.<sup>2</sup> Mr. Williams is in the process of helping his family re-locate. He intends to rent a U-Haul in Chatsworth, California on January 25, 2022 and transport furniture to Goodyear Self Storage, located at 2121 S. Litchfield Rd, Goodyear, Arizona

<sup>1</sup> On October 18, 2021, Mr. Williams was arraigned on three specifications related to his violation of supervised release. The Court released Mr. Williams pursuant to the following conditions: a \$500,000 bond, co-signed by two people, and travel restricted to the Central District of California. Such conditions remained in place following his sentencing.

<sup>2</sup> Pursuant to our request, the Court agreed to recommend to the Bureau of Prisons (“BOP”) that Mr. Williams be designated to FCI Tucson/USP Tucson (camp), FCI Phoenix, or FCI Lompoc/USP Lompoc (camp), in that order. The Court also permitted Mr. Williams to surrender directly to the prison designated by the BOP on January 31, 2022 by 10:30 a.m. As of this filing, Mr. Williams has not yet been designated. As such, we may seek an adjournment of the surrender date in the coming days if Mr. Williams remains undesignated.

Granted

85338. While in Arizona, Mr. Williams will be staying at the Hyatt Airport Place, located at 1413 W Rio Salado Pkwy, Tempe, Arizona, 85281. He would like to do the same on January 29, 2022. While in Arizona, Mr. Williams will remain in contact with his supervising officer, Probation Officer Alan Barahona.

It is my understanding that Officer Barahona of the Central District of California does not object to this request. I am awaiting the Government's position.

Thank you for your consideration.

Respectfully submitted,

/s/

Anthony Cecutti

*Counsel for James David Williams*

SO ORDERED: N.Y., N.Y.

1/24/22

Kimba M. Wood

KIMBA M. WOOD  
U.S.D.J.